

CalPERS Personal Trading: MyComplianceOffice Platform

Investment Compliance
FY 2022-23

Agenda

- Objective
- MyComplianceOffice (MCO) Introduction
 - How to Access MCO
 - How to Request for Pre-clearance
 - How to View/Add Accounts
- System Demo
- System Summary, Next Steps & Questions
- Contact and Resources
- Appendix
 - Non-designated & Managed Accounts

Objective

To provide an overview of the MyComplianceOffice (MCO) platform that will replace MyComplianceTechnologies (MCT) in February 2023.

- Preview the new MCO platform functionality
- Share key dates and information

MyComplianceOffice – MCO

CalPERS Investment Compliance team is excited to transition to the MCO platform for the administration of the §558.1 Personal Trading Regulations.

Who's impacted: All Covered Persons

When: February 2023 (GCO soft launch 1/17/2023)

Why: MCO acquired Schwab Compliance Technologies in May 2022 (rebranded to MyComplianceTechnologies/MCT) and are transitioning all clients to the new platform.



How to access MyComplianceOffice (MCO)

- Link to login: <https://www.mycomplianceoffice.com/customer/portal>
- Username: firstname.lastname@calpers.ca.gov
- Password: temporary password will be provided via email



MCO
MyComplianceOffice

Log In

Username
Enter your email or username

Password
Enter your password

☐ Remember me

Log In

Forgotten [Username](#) or [Password](#)?

MCO
MyComplianceOffice
Privacy Statement | © MyComplianceOffice 22.4.1

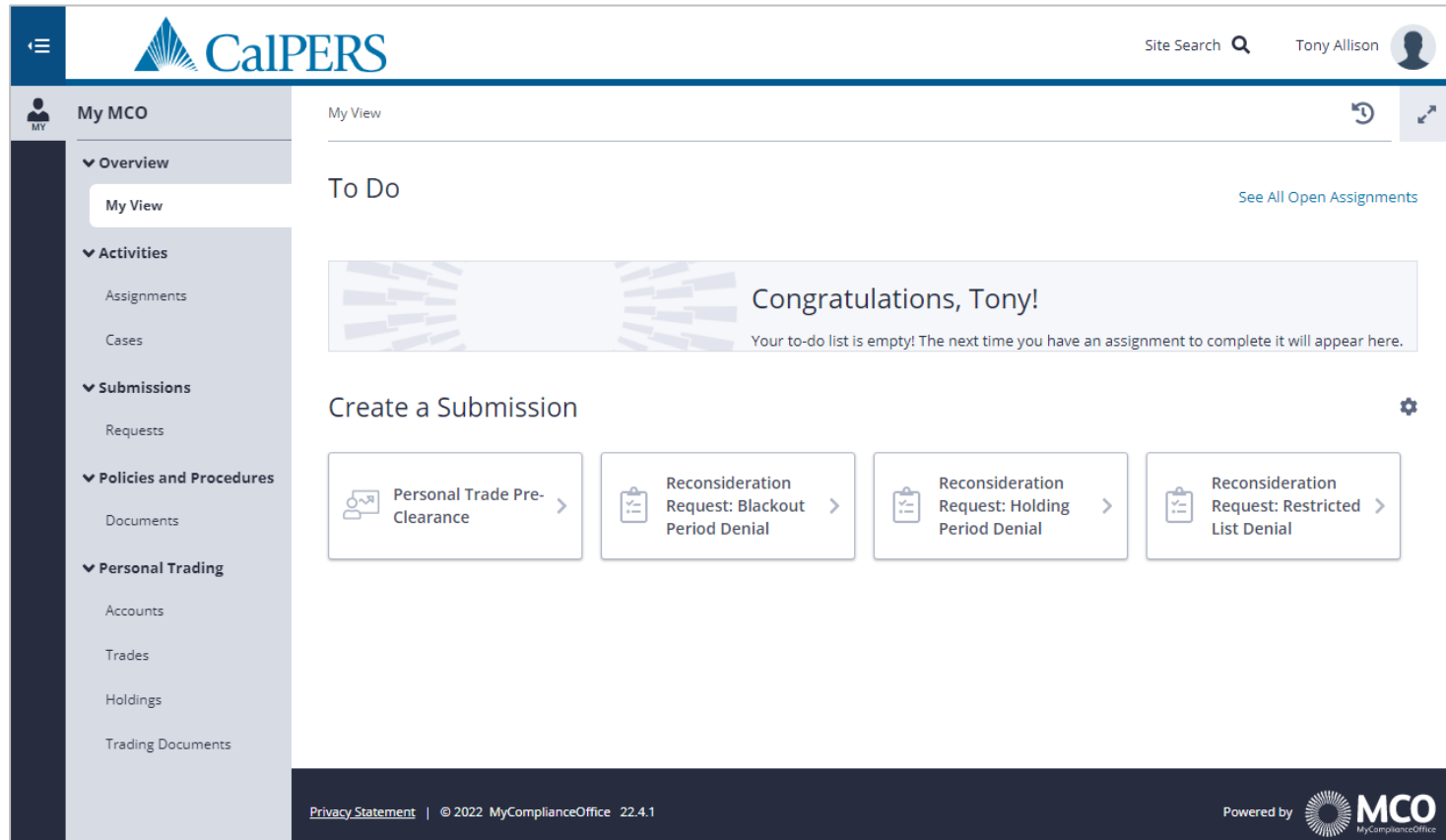
digicert
SECURED

AICPA
SOC

ISO
27001
CERTIFICATION
EUROPE

MCO Homepage

Intuitive homepage with quick access to pre-clear trades:

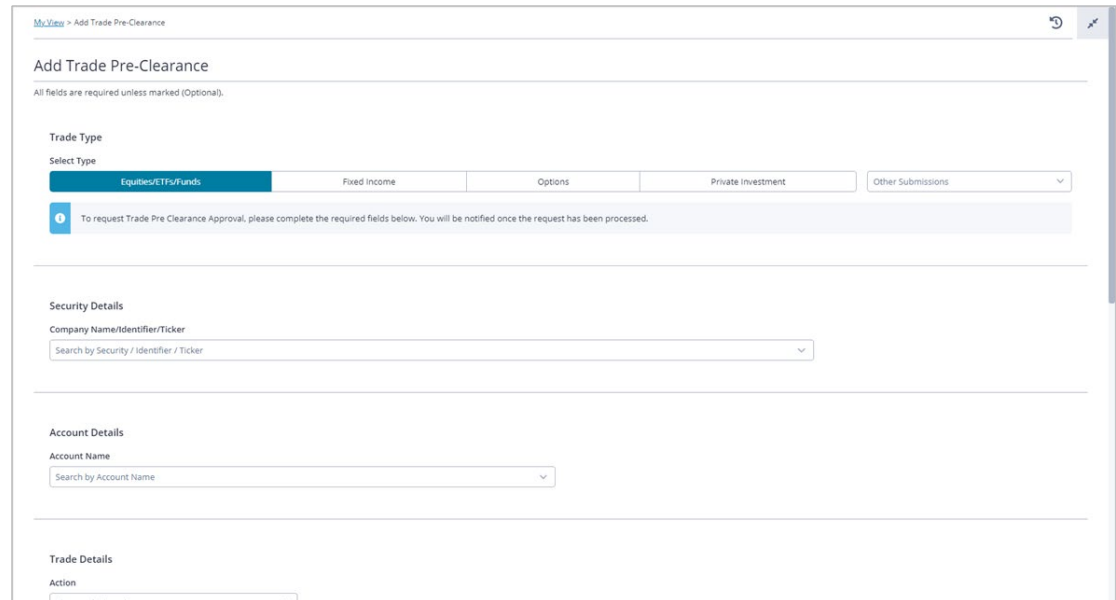


Requesting for Pre-clearance

How to Request for Pre-Clearance (1 of 2)

Request for pre-clearance by clicking “Personal Trade Pre-clearance” from the home page. Enter standard trade details and hit Submit.

- Ticker Symbol
- Brokerage Account
- Action
- Order Type
- Quantity
- Attestation

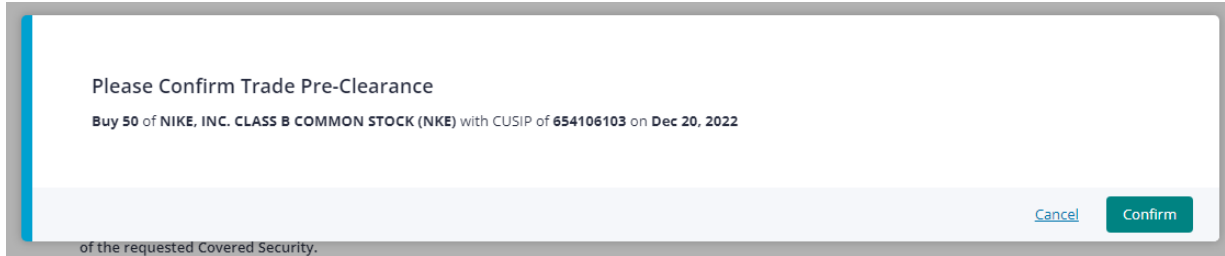


The screenshot shows the 'Add Trade Pre-Clearance' form in the MyComplianceOffice (MCO) system. The form is titled 'Add Trade Pre-Clearance' and includes a note: 'All fields are required unless marked (Optional)'. The 'Trade Type' section has a 'Select Type' dropdown with options: 'Equities/ETFs/Funds' (selected), 'Fixed Income', 'Options', 'Private Investment', and 'Other Submissions'. Below this is a message: 'To request Trade Pre Clearance Approval, please complete the required fields below. You will be notified once the request has been processed.' The 'Security Details' section has a 'Company Name/Identifier/Ticker' dropdown with a search prompt 'Search by Security / Identifier / Ticker'. The 'Account Details' section has an 'Account Name' dropdown with a search prompt 'Search by Account Name'. The 'Trade Details' section has an 'Action' dropdown.

The forms change based on security type (equities, fixed income, etc.)

How to Request for Pre-Clearance (2 of 2)

After clicking Submit, a confirmation will populate, click “Confirm” to submit the pre-clearance:



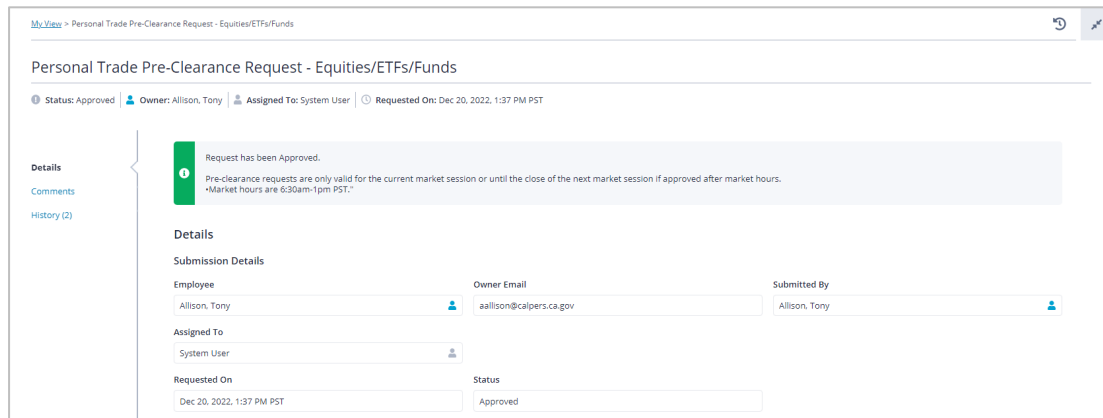
Please Confirm Trade Pre-Clearance

Buy 50 of NIKE, INC. CLASS B COMMON STOCK (NKE) with CUSIP of 654106103 on Dec 20, 2022

[Cancel](#) [Confirm](#)

of the requested Covered Security.

Next page will display status & confirmation details:



[My View](#) > Personal Trade Pre-Clearance Request - Equities/ETFs/Funds

Personal Trade Pre-Clearance Request - Equities/ETFs/Funds

Status: Approved | Owner: Allison, Tony | Assigned To: System User | Requested On: Dec 20, 2022, 1:37 PM PST

Details

Comments

History (2)

Request has been Approved.

Pre-clearance requests are only valid for the current market session or until the close of the next market session if approved after market hours.
Market hours are 6:30am-1pm PST.

Details


Submission Details

Employee	Owner Email	Submitted By
Allison, Tony	aalison@calpers.ca.gov	Allison, Tony
Assigned To		
System User		
Requested On	Status	
Dec 20, 2022, 1:37 PM PST	Approved	


Pre-Clearance Confirmations

Once the pre-clearance request has been submitted, you will see an alert indicating Approved, Denied or Pending status. **Statuses are color coded:**

Status: **APPROVED**

 Request has been Approved.
Pre-clearance requests are only valid for the current market session or until the close of the next market session if approved after market hours.
•Market hours are 6:30am-1pm PST."

Status: **PENDING APPROVAL**

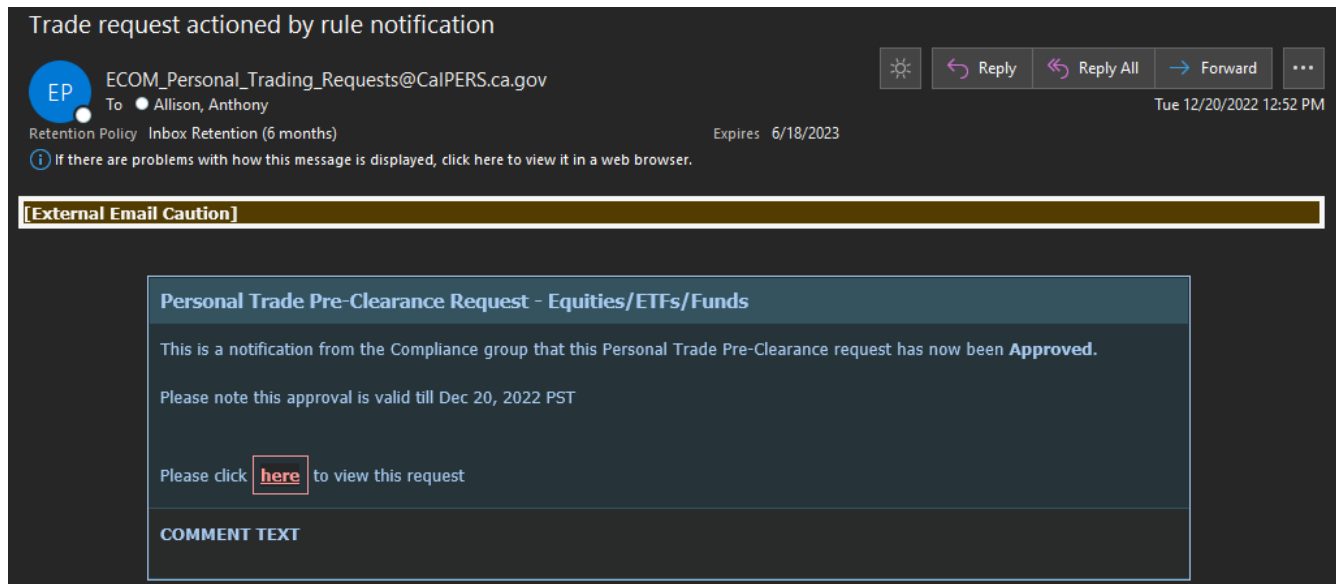
 Your request is pending approval. You will be notified once the request has been approved or denied.

Status: **DENIED**

 Request has been Denied.

Pre-Clearance Confirmations - Continued

Users will also receive an email confirmation with a link to the request and the request's expiration date.



Pre-clearance requests are only valid for the current market session or until the close of the next market session if approved after market hours.

- Market hours are 6:30am-1pm PST.

Fixed Income Pre-clearance Requests

Select “Personal Trade Pre-clearance” from the home page, toggle to “Fixed Income,” enter standard trade details and hit Submit.

- Identifier
- Brokerage Account
- Action
- Total Par Value
- Attestation

MyView > Add Trade Pre-Clearance

Add Trade Pre-Clearance

All fields are required unless marked (Optional).

Trade Type

Select Type

Equities/ETFs/Funds Fixed Income Options Private Investment Other Submissions

To request Trade Pre Clearance Approval, please complete the required fields below. You will be notified once the request has been processed.

Security Details

Company Name/Identifier/Ticker

Search by Security / Identifier / Ticker

Account Details

Account Name

Search by Account Name

Trade Details

Action

Options Pre-clearance Requests

Select “Personal Trade Pre-clearance” from the home page, toggle to “Options,” enter standard trade details and hit Submit.

- Ticker Symbol*
- Strike Price*
- Expiry Date*
- Brokerage Account
- Action
- Order Type
- Number of Contracts
- Attestation

MyView > Add Trade Pre-Clearance

Add Trade Pre-Clearance

All fields are required unless marked (Optional).

Trade Type

Select Type

Equities/ETFs/Funds Fixed Income **Options** Private Investment Other Submissions

To request Trade Pre Clearance Approval, please complete the required fields below. You will be notified once the request has been processed.

Underlying Security

Company Name/Identifier/Ticker

Search by Security / Identifier / Ticker

Strike Price Expiry Date

e.g. 1000.00 Select Date

Account Details

Account Name

Search by Account Name

Cancel Submit for Approval

**Differs from MCT options pre-clearance requests (MCO does not use OCC symbology)*

Private Investments Pre-clearance Requests

Select “Personal Trade Pre-clearance” from the home page, toggle to “Private Investments,” enter required fields and hit Submit.

- Investment Details
- Business Entity*
- Expiry Date
- Account Details
- Trade Details
- Conflict Questions
- Attestation

MyView > Add Trade Pre-Clearance

Add Trade Pre-Clearance

All fields are required unless marked (Optional).

Trade Type

Select Type

Equities/ETFs/Funds Fixed Income Options **Private Investment** Other Submissions

To request Trade Pre Clearance Approval, please complete the required fields below. You will be notified once the request has been processed.

Investment Details

Do you already have a holding in this Private Investment?

Yes No

Choose Private Security

Start typing

Account Details

Is there an associated account with this trade pre-clearance?

Yes **No**

Cancel Submit for Approval

**MCO has a private business security master list to select from*

Brokerage Account Maintenance

View Existing and Add New Accounts

Covered Persons can view their existing brokerage accounts and add New Accounts by clicking the “Accounts” link under the Personal Trading tab.

Accounts

Accounts

Add New Account

Reports

Account ID

Account Name

Financial Instit...

Status at Financ...

Status

Pending Review

Account Data S...

Online Access D...

Attested

	Fidelity Roth IRA	Fidelity Investments	Open	Active	No	Direct Feed From F...	No Authentication ...	Yes
	Fidelity Cash	Fidelity Investments	Open	Active	No	Direct Feed From F...	No Authentication ...	Yes

Total results: 2

To add a new account, click the “Add New Account” button in the upper left had corner.

The next screen will take you to the account disclosure form where you can enter the required information and hit Submit.

Adding New Accounts (1 of 2)

The account disclosure form requires you to enter the following information:

- **Financial Institution/Broker**
 - Current CalPERS Designated Brokerage List plus capability to add Robinhood, LPL Financial, and Raymond James accounts/feeds
- **Account ID** (Account Number)
- **Account Full Name**
- **Account Short Name** (will auto populate)
- **Do you have Trading Discretion over this Account?** (Selecting “No” indicates the account is a Managed Account. A managed account letter will be required if “No” is selected.)
- **Can this Account hold Covered Securities?** (Selecting “No” indicates the account can only transact in non-Covered Securities, such as open-ended mutual funds.)
- Click **Submit**

Adding New Accounts (2 of 2)

Accounts > Add Account

Add Account

All fields are required unless marked (Optional).

i All CalPERS covered persons are required to disclose covered/monitored accounts as defined in 558.1, Personal Trading Regulations. Please fill in all the required fields with your account information. If your Financial Institution does not appear in the dropdown list, please select "Other" and type in the name of the Financial Institution in the Account Description field.

On Behalf Of

Employee

Anthony Allison

Account belongs to

Self

Account Details

Financial Institution/Broker

-- Please Select --

Account ID

Account Full Name

Account Short Name

Account Description (Optional)

Accounts > Add Account

Account Full Name

Account Short Name

Account Description (Optional)

Additional Details

Account Status (Optional)

Open Closed

Date Account Opened (Optional)

Select Date

Do you have Trading Discretion over this Account? **i**

Yes No

Choose one of the above

Can this Account hold covered Securities? **i**

Yes No

Choose one of the above

Any other Information relevant to this Account (Optional)

Cancel Submit

Once submitted, the account disclosure goes to Investment Compliance to review; we then work to establish the electronic feed with the broker-dealer.

Annual Attestation

Annual Attestation (1 of 4)

CalPERS Personal Trading Regulations require Covered Persons attest to the below annually (due by first business day of April):

1. Personal Trading Regulation Attestation
2. Covered Account Validation
3. Account Statement and Confirmation Authorization

This is a requirement for all Covered Persons, regardless of if you have Covered Accounts and/or trade in the markets.

Annual Attestation (2 of 4)

Personal Trading Regulations Attestation

Download the Section 558.1 Personal Trading Regulations (you must click and download the Regulations before you can respond).


Provide your certification that you have read the Regulations.

[My View](#) > CalPERS Initial Personal Trading Regulation Affirmation - Personal Trading Regulation

↻

↗

▼ Associated Documents

Name	Type	Size	Attached...	Attached...	
Personal Tr...	pdf	192 kb	Mai Thao	Sep 20, 2022	

You must open these documents to complete this assignment.

Assignment Questions

In the Associated Document section above, please download and read the Cal. Code of Regs. Section 558.1 Personal Trading Regulations. Upon completion, please provide your certification.

Attestation Statement

Attestation Statement

I hereby certify that I have read and understand the Cal. Code of Regs. Section 558.1 Personal Trading Regulations.

☐ Check to accept signature

[Return to Overview](#) [More Actions](#) [Save as Draft](#) [Complete](#)

Annual Attestation (3 of 4)

Covered Account Validation

Select “No” if you do not have any Covered Accounts to Disclose.

Select “Yes” to disclose your Covered Accounts (slides 15-17).

If you already have existing accounts, it will ask you to review and attest that the disclosed is still true and correct.

MyView > CalPERS Initial Personal Trading Regulation Affirmation - Covered Account Validation

Assignment Questions

Do you or your spouse or registered domestic partner have a brokerage account in your name(s) or have authorization to execute or direct transactions in a brokerage account to purchase, sell, or hold a Covered Security (e.g., stocks, bonds, futures, options)?

Select...

*If you have a Managed Account, please download the Managed Account Certification Letter and attach the completed form to the disclosure of your Managed Account. Effective October 1, 2019, Managed Account Holders must certify annually that the disclosed account information is current and provide an updated copy of the Managed Account Certification Letter from the third-party money manager.

Please email [Enterprise Compliance](#) with questions.

[Managed Account Certification Form.docx](#)

Attestation Statement

Attestation Statement

I attest, that the information provided is true and correct to the best of my knowledge.

☐ Check to accept signature

[Return to Overview](#) [More Actions](#) [Save as Draft](#) [Complete](#)

Attestations (4 of 4)

Account Statement and Confirmation Authorization

A “Yes” response affirms that you authorize your broker to send duplicate account statements and trade confirmations to CalPERS for your Covered Accounts.

Note: If you do not have any Covered Accounts, a “Yes” response affirms you will allow authorization of any future disclosed Covered Accounts.

MyView > CalPERS Initial Personal Trading Regulation Affirmation - Account Statement and Confirmation Authorization

Assignment Questions

COVERED PERSON WITH COVERED ACCOUNT(S):
I authorize my broker(s) to provide duplicate account statements and trade confirmations to CalPERS/MyComplianceOffice (MCO) for me and my Spouse or Registered Domestic Partner.

COVERED PERSON WITH COVERED ACCOUNT(S):
If I become the owner of a Covered Account, I agree to authorize my broker(s) to provide duplicate account statements and trade confirmations to CalPERS/MyComplianceOffice (MCO) for me and my spouse or registered domestic partner.

☐ Yes, I agree.

Attestation Statement

Attestation Statement

I attest, that the information provided is true and correct to the best of my knowledge.

☐ Check to accept signature

[Return to Overview](#) [More Actions](#) [Save as Draft](#) [Complete](#)

System Demo and Setting Up User Account

<https://www.mycomplianceoffice.com/customer/portal>

Summary of MCO Update

The personal trading module of MCO is similar to MCT; this is essentially a user interface update:

- Pre-clearance Request and Account Disclosure process remains unchanged
- Questionnaires will remain the same (Annual/Quarterly Transactions)

Down the road, MCO will be used more broadly as an electronic GRC platform:

- Implement additional modules to manage risk and prevent conflicts
- Gifts, Outside Business Activities, Other Forms & Attestations (MCO's Know Your Employee suite of services)

The items discussed and graphics displayed are subject to change.

Contact and Resources

For additional questions, please contact:

- ECOM_Personal_Trading_Requests@CalPERS.ca.gov

Additional resources can be found here:

- [CalPERS Personal Trading Information Center](#) (Internal)
- [Personal Trading Regulations Resources](#) (External)

Appendix

Managed Accounts

Adding New Managed Accounts

The account disclosure form requires you to enter the following information:

- **Financial Institution/Broker**
 - Current CalPERS Designated Brokerage List plus capability to add Robinhood accounts/feeds
- **Account ID** (Account Number)
- **Account Full Name**
- **Account Short Name** (will auto populate)
- **Do you have Trading Discretion over this Account?** (Selecting “No” indicates the account is a Managed Account. A managed account letter will be required if “No” is selected.)
- **Can this Account hold Covered Securities?** (Selecting “No” indicates the account can only transact in non-Covered Securities, such as open-ended mutual funds.)
- Click **Submit**

Managed Account Certification

Covered Persons with Managed Accounts must certify annually by first business day of April.

- Review accounts, attach an updated Managed Account Certification and certify.

Assignment Questions

Do you or your Spouse/Registered Domestic Partner have a brokerage account(s) that is managed by a third-party money manager who has full discretion to act as an investment advisor and manage any investment trading activities in your account(s)?

A Managed Account must meet ALL of the following criteria:

- It is managed by a third-party who is not a Covered Person,
- No Covered Person has the power to affect or ability to control or influence investment decisions in the account, and
- No Covered Person communicates(directly or indirectly) with the person(s) with the investment discretion regarding specific trade activity in the account.



Yes

No

Choose one of the above

Accounts Attestation (All Active Data)

Add New Account

Account ID	Account Name	Financial Institution	Status at Financial Institution	Status	Pending Review	Attested	
1234567a	TestAccount	Robinhood	Open	Active	Yes	Yes	 

☐ I attest that the Accounts data above is correct.

Total results: 1

Please click the link below to download the Managed Account Certification Form. If you answer yes to the Assignment Questions, you must attach an updated copy of your Managed Account Certification Form, once it is signed by your third-party money manager. You will not be allowed to submit the Affirmation until you complete this requirement.

[Managed Account Certification Form.docx](#)

[Return to Overview](#)

More Actions

Save as Draft

Complete

Non-Designated Brokerage Accounts

Adding Non-Designated Brokerage Accounts (1 of 2)

The account disclosure form requires you to enter the following information:

- **Financial Institution/Broker**
 - Select “Other” form the drop-down list
- **Account ID** (Account Number)
- **Account Full Name**
- **Account Short Name** (will auto populate)
- **Account Description** (enter the name of the non-designated broker, if “Other” was selected as the Financial Institution/Broker)
- **Do you have Trading Discretion over this Account?** (Selecting “No” indicates the account is a Managed Account. A managed account letter will be required if “No” is selected.)
- **Can this Account hold Covered Securities?** (Selecting “No” indicates the account can only transact in non-Covered Securities, such as open-ended mutual funds.)
- **Any other Information relevant to this Account** (Provide the reason as to why you cannot move to the account to a designated broker.)
- Click **Submit**

Adding Non-Designated Brokerage Accounts (2 of 2)

Accounts > Add Account

Add Account

All fields are required unless marked (Optional).

i All CalPERS covered persons are required to disclose covered/monitored accounts as defined in 558.1, Personal Trading Regulations. Please fill in all the required fields with your account information. If your Financial Institution does not appear in the dropdown list, please select "Other" and type in the name of the Financial Institution in the Account Description field.

On Behalf Of

Employee

Anthony Allison

Account belongs to

Self

Account Details

Financial Institution/Broker

-- Please Select --

Account ID

Account Full Name

Account Short Name

Account Description (Optional)

Accounts > Add Account

Account Full Name

Account Short Name

Account Description (Optional)

Additional Details

Account Status (Optional)

Open Closed

Date Account Opened (Optional)

Select Date

Do you have Trading Discretion over this Account? **i**

Yes No

Choose one of the above

Can this Account hold covered Securities? **i**

Yes No

Choose one of the above

Any other Information relevant to this Account (Optional)

Cancel Submit

Once submitted, the account disclosure goes to Investment Compliance to review.

Maintaining a Non-Designated Brokerage Account

Covered Persons who hold Non-Designated Brokerage Account(s) are required to:

- **Pre-clearance Approval:** Prior to the buying, selling or transferring of Covered Securities.
- **Holding Period:** The 30-calendar day between the acquisition and sale, and the 30-calendar day period between sale and re-acquisition, of a Covered Security, on a last-in first-out basis.
- **Blackout Period:** Covered Persons are prohibited from buying, selling or transferring Covered Securities during the Blackout Period for transactions you direct (i.e., purchase additional shares or sale of shares). The Blackout Period means the three-day period of time that commences one market day before and ends one market day after a transaction in Covered Securities by CalPERS.
- **Completion of Quarterly Transaction Affirmations:** Upload statements for each Non-Designated Brokerage account and manually disclosing transactions from the previous quarter in which you directed (i.e., purchase additional shares or sale of shares).

Maintaining a Non-Designated Brokerage Account - Continued

- **Completion of Quarterly Transaction Affirmations:**
 - Manually disclosing transactions from the previous quarter in which you directed (i.e., purchase additional shares or sale of shares) and upload statements for each Non-Designated Brokerage account.

Assignment Details

Assigned To

From

Description

You are required to complete the Quarterly Transaction Affirmation because your broker does not provide account activity electronically to MyComplianceOffice (MCO). Pursuant to the Personal Trading Regulations (see Cal. Code Regs. Section 558.1 (k)(4)), you are required to report all purchases, sales, and transfers of Covered Securities on a quarterly basis within 30 calendar days of quarter end. In addition, you are required to upload all monthly/quarterly statements to MCO for the previous quarter, for all applicable Covered Accounts.

Assignment Questions

For Covered Accounts from brokers or broker-dealers that do not provide account activity information electronically to the On-Line Platform, Covered Person Employees and Board Members must report all purchases, sales and transfers of Covered Securities on a quarterly basis, within 30 calendar days after the first day of each new calendar quarter.

Trades Attestation (From Oct 01,2022 To Dec 31,2022)

Add New Trade

Trade Date	Sec. Type	Action	Security Name	Symbol	Qty	Price	Financial Inst	Account No.	Trade Source	Open Alerts	Review Status
No data available											

☐ I certify these investment transactions are accurate and complete to the best of my knowledge.

Total results: 0

Attestations - Quarterly Transaction Affirmations

- Manually enter buys, sells and transfers for the quarter that took place in your any of your Non-Designated Brokerage accounts.
- Upload the statements for all your Non-Designated Brokerage accounts for the previous quarter.

Assignment Questions

For Covered Accounts from brokers or broker-dealers that do not provide account activity information electronically to the On-Line Platform, Covered Person Employees and Board Members must report all purchases, sales and transfers of Covered Securities on a quarterly basis, within 30 calendar days after the first day of each new calendar quarter.

Trades Attestation (From Oct 01,2022 To Dec 31,2022)

Add New Trade

Trade Date	Sec. Type	Action	Security Name	Symbol	Qty	Price	Financial Inst	Account ...	Trade Sour...	Open Alerts	Review Status	
Dec 19, 2022	Equities	Buy	TESLA, INC. COMMON STOCK	TSLA	10	150	Robinhood	1234567a	My Trades	2	Reviewed	
Dec 08, 2022	Equities	Sell	INTERNATIONAL BUSINESS MACHINES COR...	IBM	2	160	Robinhood	1234567a	My Trades	2	Reviewed	

Total results: 2

☐ I hereby certify these investment transactions are accurate and complete to the best of my knowledge. I have uploaded all brokerage statements and have individually entered each purchase, sale and transfer of Covered Securities for me and my Spouse or Registered Domestic Partner for the previous quarter.

Attachments

Attach Documents to this Assignment

Drag & drop files here

Browse files to upload

Name	Size	Comments	Attached By	Attached On
No Data				

[Return to List](#)

More ActionsSave as DraftComplete